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California Department of Water Resources
Urban Water Use Efficiency Unit
ATTN: Julie Saare-Edmonds, Senior Environmental Scientist
P.O. Box 942836
Sacramento, CA 94236-0001

RE: Public Draft Comments for Model Water Efficient Landscape Ordinance

Dear Ms. Saare-Edmonds,

Thank you for the opportunity to provide comments on the Public Draft of the Model Water Efficient Landscape Ordinance dated June 12, 2015. Our office has reviewed the draft and we have the following comments and questions:

Section 490.1(b) This section should also include exemptions for:

- "Projects that replace turf with California native/friendly plants"
- "Projects that replace sprinkler heads with drip irrigation"
- "Fuel Modification zones as determined by the respective Fire Authority"
- "Agricultural lands as determined by the City/County"
- "Orchards"
- "Cemeteries"
- "Projects proposing drought-tolerant turf or grass for use as ball fields, football fields, soccer fields, golf courses including, but not limited to, any other sport field may be granted an exemption by the final decision-making body"

Section 491 The following definitions should be clarified:

- "Landscape Designer". The creation of this definition is appreciated however it only references 'single-family dwellings'. It should include all landscape areas and Cities/Counties can further regulate the requirements and qualifications for the plan preparer.

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- "Rehabilitated Landscape". The definition includes a threshold for "*equal to or greater than 2,500 square feet, is 50% of the total landscape area, and the modifications are completed within one year*". The 50% and one year reference is confusing, consider deleting this threshold. The 2,500 square feet makes sense since it is directly referenced in Section 490.1.
- "Plant Factor". The definition includes the following new text "*as approved by the California Department of Water Resources (DWR)*". Will the DWR place the 'approved' institutions and associations on the website and update them annually or as needed?

Section 492.7 Section (a)(1)(A) states that "*Dedicated landscape water meters shall be required for all non-residential irrigated landscapes of 1,000 sq. ft. but not more than 5,000 sq. ft.*" The reference to 5,000 sq. ft. is confusing and seems out of place; consider adding the word 'between' after the words "*irrigated landscapes*".

Section 492.8 This section is written to require the preparation of a Grading Plan for an HOA common area that removes turf (2,500 square feet) and replaces it with native plants and a drip system. If the area is flat and does not result in any grading/erosion impacts and is not subject to a building permit, what is the purpose of the Grading Plan? Based on our experience locally, several HOA's have been discouraged from removing turf because of the requirement to hire a Civil Engineer to prepare a Grading Plan (for flat areas). This requirement should be left to the Cities/Counties to administer in accordance with their local codes and standards.

Section 492.16 This section recommends retention and infiltration (24-hour rain event) while section 492.6(3)(b) mandates ('shall') under subsection (10) to "*identify location, installation details, and 24-hour retention or infiltration capacity...*" This may be difficult to achieve in some cases where the site requires area drains in order to avoid flooding or runoff or landslides. The 24-hour reference should be revised to read 'where appropriate'.

Again, thank you for the opportunity to provide comments and if you have any questions, please feel free to contact our office at (949) 443-6320.

Sincerely,


David Contreras
Senior Planner